

Message

From: Riley, Jeffrey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=99C9D11DF3BD45768341AED24303D341-RILEY, JEFFREY]
Sent: 12/22/2014 7:53:52 PM
To: Buzzelle, Stanley [Buzzelle.Stanley@epa.gov]
CC: Tejada, Matthew [Tejada.Matthew@epa.gov]; Ruhl, Suzi [Ruhl.Suzi@epa.gov]
Subject: RE: Follow-up on Harbor Bridge Review
Attachments: Port_EIS_Final_RoD-042007Charleston.pdf

Good Afternoon Stan,

Thanks for sending the list of OEJ's questions on the Harbor Bridge FEIS. I tried calling you at the cell number you provided below, but for some reason I keep getting a message that the call can't be completed as dialed. I'll e-mail you and mention that after today, I'll be out the remainder of this week and back in next Monday.

I have been looking for any examples of air monitoring being implemented as part of a strategy to address air quality concerns, and I've only managed to find a South Carolina State Port Authority RoD for a project at the Charleston Naval Center (attached) that involved SCSPA purchasing an air quality monitor (pg. 41 – Compensatory Mitigation) to establish pre-construction baseline levels. It appears that the main intent was to focus this effort only on construction-related emissions, considerably smaller scope than the Harbor Bridge analysis.

It should be noted that the SC mitigation was done in a nonattainment area subject to general conformity under the Clean Air Act, and Corpus Christi is attainment/not subject to general conformity. There was a definite "hook" for analysis and mitigation action under the CAA in the SC example, but I'm still not sure what could be done under CAA for Corpus Christi.

I'll be around until 3:30 CST today, and back in next Monday at 7:00 CST.

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From: Buzzelle, Stanley
Sent: Friday, December 19, 2014 3:04 PM
To: Riley, Jeffrey
Cc: Tejada, Matthew; Ruhl, Suzi
Subject: Follow-up on Harbor Bridge Review

Hi Jeff,

I'm following up on our previous conversation re: the Harbor Bridge FEIS air issues. I was wondering if you've had a chance yet to look into the issues we discussed (e.g., localized impacts and mitigation monitoring examples)? Any examples you've found where air monitoring was implemented would be a great help.

As I mentioned previously, I've developed a list of questions that OEJ is hoping you have some insight into. I've listed four main questions below and I've attached a document with some additional questions that we have regarding the sufficiency of the air impacts analyses for the Northside community. Any help that you can provide in answering these questions is greatly appreciated by Matt, Suzi, and me.

Given that the FEIS states there may be localized increases in MSAT emissions which would likely be most pronounced along highways sections adjacent to residential areas (e.g. Northside community) and also states that these impacts are predominantly borne by minority and low-income populations:

1. 1. Is it sufficient that the FEIS analyzed the change in emissions between the No Build and Preferred Alternative in general (added capacity) but did not analyze the change/impacts in air emissions that the Northside community will experience between the No Build and the Preferred Alternative?
2. 2. Is it sufficient that the FEIS relied on national-level modeling for EPA air rules to mitigate air impacts to the Northside community?
3. 3. Is it sufficient that the FEIS only conducted a regional-level quantitative MSAT analysis, rather than an analysis of localized impacts to the Northside community?
4. 4. Is it sufficient that the FEIS did not find any cumulative air impacts to a community located next to a port undergoing immense expansion and surrounded on all sides by two highways, a rail yard, and refineries, and which has a history of air emission concerns (benzene, PM)? Note: It does not appear that the cumulative impacts analysis took into account the additional truck and rail emission that will likely result from raising the bridge elevation (e.g. increased cargo from post-Panamax vessels). Can you confirm for me that this is the case?

In addition to understanding if the FEIS is deficient for the issues mentioned above, we would like to identify specific mitigation measures (e.g. air monitoring in the Northside community) that we can recommend be implemented.

I really appreciate your helping OEJ to better understand the air issues discussed above and the additional concerns that I've attached to this email. Please give me a call today or early next week to discuss these matters further. I can be reached on my cell at Ex. 6 Personal Privacy (PP)

Regards,
Stan